



Takhar Group of Companies

Takhar Collection Services Ltd.,

Takhar Investments Inc.

202 Beverly Street, Cambridge, Ontario N1R 3Z8

Phone (888) 246-3871 Fax (519) 622-6411

FILED
IN CLERKS OFFICE

2010 OCT 14 P 3:22

U.S. DISTRICT COURT
DISTRICT OF MASS.

Monday, October 4th, 2010

Lemberg & Associates, LLC

1100 Summer St, 3rd Floor

Stamford, CT 06905

Attention: Sergei Lemberg

Re: 1:10-cv-10658-LTS, Sandra Daly vs. Takhar Collection Services Ltd.

Mr. Lemberg,

In regards to your Summons in a Civil Action filed on April 19, 2010 and served to our office on August 20, 2010, we hereby respond:

We are in receipt of your claim far past the filing date, however we are prepared to respond to the following matters:

- 1) Your claim states that our office allegedly placed excessive calls to the Plaintiff, as often as six to seven times per day. Our office contests this alleged claim, and states we attempted to contact the plaintiff on the following occasions:

2010-04-03 11:02:23

2010-04-02 09:07:44

2010-04-01 12:26:28

2010-03-31 10:38:32

2010-03-26 10:54:23

2010-03-25 09:52:58

2010-03-24 11:49:39

2010-03-23 09:14:24

2010-03-22 17:23:59

- 2) On speaking with the Plaintiff, they stated they wished to remit payment on a number of occasions and identified herself as cooperative and willing to pay.
- 3) In our last contact with the Plaintiff on 2010-04-03 11:02:23, the Plaintiff did indicate she was represented by an attorney, however she did not state who her attorney was, and terminated the call before we could receive that information. Regardless, we have not attempted to contact the Plaintiff since that day.
- 4) Our office contests that we have used rude or abusive language, and holds the Plaintiff to strict proof of claim.

301 Beverly Street, Cambridge, MA 02138
Phone (617) 354-3271 Fax (617) 354-4411

(3) The Plaintiff claims our office has not sent any notification of this debt in writing. Our records indicate that upon receiving the alleged debt in our office on October 19, 2009, an initial communication was issued to the Plaintiff that advised her of the debt and that the Plaintiff was to pay the debt within 30 days. The Plaintiff has not paid the debt and has not responded to our office's request for payment.

(12) At no point has the Defendant used, through language and symbols on an envelope addressed to the Plaintiff, that the communication concerned debt collection. Instead, the Plaintiff's allegation WXY is in direct contradiction of allegation that a letter was not received at any point.

(13) At no point has the Defendant attempted to pay to a debt that was disputed, as the Plaintiff is not owed the debt.

(14) At no point has the Defendant contacted collection efforts and through the debt was to be resolved, as the Plaintiff consented to the debt, and agreed to remit payment on a number of occasions.

(15) At no point has the Defendant performed any attempt to contact the Plaintiff outside of the bounds set by the FDCPA, nor has this activity violated the Massachusetts Consumer Protection Act.



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- 5) The Plaintiff claims our office has not sent any notification of this debt in writing. Our records indicate that upon receiving the alleged debt in our office on October 12, 2009, an initial communication was issued to the Plaintiff's last known address of 57 Waterville St, North Grafton, MA 01536. Further, the Plaintiff requested a second notice to be sent to her address on March 31, 2010, which was done.
- 6) Both letters issued to the Plaintiff on October 12, 2009 and March 31, 2010 explained the rights to dispute under the FDCPA, and the allegation to the contrary is false.
- 7) The claim of the Plaintiff that they have suffered at the actions of Takhar Collection Services, and that the Defendant's conduct is "outrageous in character", is spurious and without documentation, and we hold the Defendant to strict proof of claim.
- 8) At no point has the Defendant contacted the Plaintiff at a place and time known to be inconvenient.
- 9) At no point has the Defendant contacted the Plaintiff after having knowledge that the Plaintiff was represented by an attorney.
- 10) At no point has the Defendant used profane or abusive language.
- 11) At no point has the Defendant used false or deceptive means to attempt to collect a debt.
- 12) At no point has the Defendant used, through language and symbols, on an envelope addressed to the Plaintiff that the communication concerned debt collection. In fact, the Plaintiff's allegation #27 is in direct contradiction of allegation #18 that a letter was not received at any point.
- 13) At no point has the Defendant applied payments to a debt that was disputed, as the Plaintiff at no point has remitted funds to Takhar Collection Services.
- 14) At no point has the Defendant applied payments to multiple debts, as the Plaintiff at no point has remitted funds to Takhar Collection Services.
- 15) At no point has the Defendant failed to send the Plaintiff a validation notice stating the amount of the debt, as this was done on October 12, 2009 to 57 Waterville St, North Grafton, MA 01536.
- 16) At no point has the Defendant failed to send the Plaintiff a validation notice stating the name of the original creditor, as this was done on October 12, 2009 to 57 Waterville St, North Grafton, MA 01536.
- 17) At no point has the Defendant failed to send the Plaintiff a validation notice stating the right to dispute the debt, as this was done on October 12, 2009 to 57 Waterville St, North Grafton, MA 01536.
- 18) At no point has the Defendant failed to send the Plaintiff a validation notice informing the Plaintiff of a right to have verification of the debt, as this was done on October 12, 2009 to 57 Waterville St, North Grafton, MA 01536.
- 19) At no point has the Defendant continued collection efforts even though the debt had failed to be validated, as the Plaintiff consented to the debt, and agreed to remit payment on a number of occasions.
- 20) At no point has the Defendant performed any attempt to contact the Plaintiff outside of the bounds set by the FDCPA, nor has this activity violated the Massachusetts Consumer Protection Act.
- 21) At no point has the Defendant "harassed the Plaintiff", "hounded the Plaintiff", or made calls of such frequency as to violate the Massachusetts Consumer Protection Act.

At no point has the Government advanced any evidence that the defendant was involved in the assassination of President Kennedy. The Government has failed to establish that the defendant was involved in the assassination of President Kennedy.

[illegible]

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific information required.

2. Next, gather relevant data and resources. This may include conducting research, consulting experts, or collecting data from various sources.

3. Once the data is gathered, it is important to analyze it carefully. This involves looking for patterns, trends, and anomalies that can help in understanding the problem.

4. After analysis, the next step is to develop a solution or answer. This may involve applying theoretical knowledge, using logical reasoning, or testing different hypotheses.

5. Finally, the solution should be verified and validated. This involves checking the results against the original problem and ensuring that the solution is accurate and reliable.

specific group and public action, notably by a number of leftist intellectuals, will also depend on the

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1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 26



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22) At no point has the Defendant performed any actions with malice, intent, wantonness, or recklessness in dealing or attempting to deal with the Plaintiff, and would hold the Plaintiff to strict proof of claim on these spurious allegations.

This claim lists numerous allegations of violation of the FDCPA and the Massachusetts Consumer Protection Act, but fails to provide any factual documentation, or make reference to any factual action taken by the Defendant. We find this claim to be without merit, and will vigorously defend our company's name and actions in this regard.

Regards,



Blair Wettlaufer – Manager (Operations)
Takhar Collection Services Ltd.

CC United States District Court, District of Massachusetts, 24 New Chardon St, Boston MA 02114-4703
CC Claude Isaacksz LLB, 1434 King St E, Cambridge, ON N3H 3R4

THE UNITED STATES OF AMERICA
vs.
[Name Redacted]
[Address Redacted]
[City, State, Zip Redacted]

TO THE HONORABLE CLERK OF THE DISTRICT COURT OF THE DISTRICT OF COLUMBIA
FROM [Name Redacted]
[Address Redacted]
[City, State, Zip Redacted]

RE: [Name Redacted]
[Address Redacted]
[City, State, Zip Redacted]

Very truly yours,
[Signature Redacted]
[Name Redacted]

cc: [Name Redacted]
[Address Redacted]
[City, State, Zip Redacted]

201 Beverly Street, Suite 200
Beverly Hills, CA 90212
Phone (310) 274-1234